

***Remarks***

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-15 are pending in the application, with 1, 8, and 15 being the independent claims. By this Amendment, Applicants seek to amend claims 1, 8, and 15. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

**Rejections Under 35 U.S.C. § 102**

Claims 1-15 stand rejected under 35 U.S.C. Sec. 102(b) as being anticipated by Jain et al. (U.S. Patent 6,312,134). Applicants traverse this rejection because the cited reference fails to disclose, teach, or suggest all of the features of the claimed invention.

For example, the cited reference fails to disclose, teach, or suggest a method and system for printing a pattern on a photosensitive surface including alternately activating the pixels within the pair such that only one of the pixels within an overlapping pair of pixels produces the pattern during one exposure and only the other pixel within the pair produces the pattern during an ensuing exposure, the pattern being representative of an oscillating stitching line, as recited in claims 1, 8, and 15. These features are disclosed, for example, in Applicants' specification on pages 14-16 and are illustrated in FIGs. 10 and 10A.

The Office Action states that Jain (Abstract, lines 17-18; FIG. 3; col. 6, lines 33-36; and col. 12, lines 15-18) discloses Applicants' specifically claimed features, noted

above. More specifically, the Office Action alleges Jain specifically discloses, teaches, and/or suggests alternately activating pixels within a pair of pixels wherein only one of the pixels within the pair is used to produce the pattern. Applicants, however, respectfully disagree.

For example, the Abstract of Jain, lines 17-18 seems to generally disclose a concept of using overlapping scans to equalize radiation dosages. The Abstract, however, fails to disclose, teach, or suggest anything related to Applicants' specifically recited technique of alternately activating the pixels within the pair such that only one of the pixels within an overlapping pair of pixels produces the pattern during one exposure and only the other pixel within the pair produces the pattern during an ensuing exposure, as recited in Applicants' claims.

Col. 6, lines 33-36 and col. 12, lines 15-18 of Jain seem to generally teach concepts related to the integration and uniformity of image intensity profiles. For example, col. 12, lines 15-18 indicates that DMD elements can be programmed to achieve a uniform intensity profile across adjacent scans. Col. 12, lines 15-18, however, fails to mention any specific programming techniques that can be used to achieve this uniformity. Certainly, col. 12, lines 15-18 is silent regarding Applicants' specific technique of alternately activating pixels within an overlapping pair of pixels such that only one of the pixels produces the pattern during one exposure and only the other pixel within the pair produces the pattern during an ensuing exposure. Col. 6, lines 33-36 is similarly silent regarding Applicants' specifically recited technique.

Finally, the Office Action indicates that FIG. 3 shows a stitching pattern including alternately activating pixels in an overlap region, as recited in claims 1, 8, and 15. Applicants, again, respectfully disagree.

For example, Applicants contend that FIG. 3 discloses compensating for stitching disturbances by utilizing incident illumination shaped in the form of a hexagon (col.9, lines 31-33). Using this hexagonally shaped illumination, two of the edges of the hexagon (bg and ch, lines 44-45) are perpendicular to the scan direction. Four other sides of the hexagon form two triangular illuminated areas - abc and def. The triangular shape of these illuminated areas result in attenuation of the portion of the image exposed by these triangular areas. When two stripes exposed by the triangular areas, overlap, this overlap and the attenuation can be used to compensate for the stitching disturbance (col. 9, lines 46-56).

FIG. 3, however, is absolutely silent regarding Applicants' specifically recited technique of alternately activating the pixels within an overlapping pair of pixels such that only one of the pixels produces the pattern during one exposure and only the other pixel within the pair produces the pattern during an ensuing exposure.

If a future Office Action rejects claims 1, 8, and 15, Applicants respectfully request that the Office Action specifically point out in the cited reference a method and system for printing a pattern on a photosensitive surface including alternately activating the pixels within the pair such that only one of the pixels within an overlapping pair of pixels produces the pattern during one exposure and only the other pixel within the pair produces the pattern during an ensuing exposure, the pattern being representative of an oscillating stitching line.

It is respectfully pointed out that anticipation can only be established by a single prior art reference that discloses each and every element of the claimed invention. RCA Corp. v. Applied Digital Data Systems, Inc., 730 F.2d 1440 (Fed. Cir. 1984). Therefore, since the cited reference fails to recite each and every element of Applicants' invention as

recited in claims 1, 8, and 15, claims 1, 8, and 15 are not anticipated by the cited reference and are therefore allowable.

Claims 2-7 depend from claim 1 and claims 9-14 depend from claim 8. Therefore, claims 2-7 and 9-14 are allowable, at least for the reasons claims 1 and 8 are allowable, and for the specific features recited therein.

***Conclusion***

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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